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**SOAH DOCKET 473-22-0493
PUC DOCKET NO. 52656**

APPLICATION OF AEP TEXAS INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE ANGSTROM-TO-NAISMITH DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN SAN PATRICIO COUNTY	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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DEBBIE MCANGUS' MOTION TO INTERVENE AND NOTICE OF SERVICE EMAIL

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Debbie McAngus, pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this her Motion to Intervene and Notice of Service Email in the above referenced proceeding, and in support thereof, respectfully shows the following:

I. AUTHORIZED REPRESENTATIVE

Attorneys H. Scott Taylor and Patrick L. Reznik pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Debbie McAngus in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, telephone number, and service e-mail of Intervenor's authorized representatives is as follows:

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Intervenor requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representatives.

II. JURISDICTION

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

III. BASIS FOR INTERVENTION

Intervenor has a justiciable interest in this proceeding. Intervenor owns property that may be directly impacted by one or more of the routes for AEP Texas Inc.'s ("AEP") proposed Angstrom-to-Naismith Double-Circuit 345-kV transmission line project in San Patricio County, Texas. Intervenor has been notified by AEP that her property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52 (a)(3), by the proposed transmission line that is the subject of this docket. Intervenor, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date AEP filed its Application and therefore is timely under P.U.C. PROC. R. 22.104(b). Intervenor requests that this Motion to Intervene be granted and that she be recognized as a party.

IV. ACKNOWLEDGEMENTS

Intervenor acknowledges: (1) she will be a party to the case; (2) she will be required to respond to all discovery requests from other parties in the case; (3) if she files testimony, other parties may cross-examine it at the hearing; (4) if she files any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) she is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted, that she be allowed to participate in this proceeding as a party with all rights thereof to the full extent that she desires to do so, and for such further relief to which she may be entitled.

Respectfully submitted,

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/s/H. Scott Taylor

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ATTORNEYS FOR DEBBIE MCANGUS

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 29, 2021 in accordance with the Second Order Suspending Rules issued in Project No. 50664.

/s/H. Scott Taylor
H. Scott Taylor